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**February 27, 2015**

Via ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

Re:       **Sirius Telecommunications, Inc. d/b/a Sirius Telecom**  
          **Filer ID 830352**  
          **Annual CPNI Compliance Certification - CY 2014**  
          **EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Sirius Telecommunications, Inc. d/b/a Sirius Telecom (the "Company"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's calendar year 2014 CPNI Certification.

Respectfully submitted,

/s/ Douglas D. Orvis II

Douglas D. Orvis II

Counsel for Sirius Telecommunications, Inc. d/b/a Sirius Telecom

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year - 2014.

1. Date filed: February 27, 2015
2. Name of company covered by this certification: Sirius Telecommunications, Inc. d/b/a Sirius Telecom
3. Form 499 Filer ID: 830352
4. Name of signatory: Maryann Edgecomb
5. Title of signatory: CEO
6. Certification

I, Maryann Edgecomb, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted, or petitions filed, in state commissions, the state or federal court systems, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.



Maryann Edgecomb, CEO  
Sirius Telecommunications, Inc. d/b/a Sirius Telecom

**Attachments:** Accompanying Statement explaining CPNI procedures



**SIRIUS TELECOMMUNICATIONS, INC.**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

Sirius Telecommunications, Inc. ("Sirius Telecom") is a global service provider specializing in colocation, hosted switching and network connectivity.

Consistent with FCC rules, Sirius Telecom only has access to limited forms of CPNI from its customers and has established procedures to ensure that any CPNI it holds is properly protected from unauthorized and illegal use, access and disclosure.

In compliance with the Commission's rules, Sirius Telecom may use, disclose and permit access to CPNI without customer approval (1) for network maintenance, repair and troubleshooting (2) to protect rights or property of Sirius Telecom, other users or other carriers from unlawful use; and (3) to render, bill and collect for services provided.

Should Sirius Telecom use, disclose or permit access to CPNI for sales or marketing, except to provide offerings for the kind of products and services to which a customer already subscribes, it will, prior to engaging in such marketing, implement a system by which the status of a customer's CPNI approval can be clearly established and will maintain a record of the approval. Additionally, it shall retain, for a minimum of one year, a record of any use of each customer's CPNI in any sales and marketing campaigns as well a description of the campaign and the products and services offered, and will establish a process to notify customers of such uses of their CPNI and the status of their approval. Sirius Telecom will also, for a minimum of one year, maintain records of any disclosures of CPNI to third parties, or instances where third parties were allowed access to CPNI. Sirius Telecom does not have any affiliates, but should that change, it will ensure that any use of CPNI for sales and marketing by such an affiliate will be recorded for a minimum of one year by Sirius Telecom in the same manner that it records its own use of CPNI.

Sirius Telecom trains its personnel on the importance of confidentiality and the proper and unauthorized use of CPNI. Employees who use CPNI in an unauthorized manner are subject to discipline and may be released from employment. These potential disciplinary measures are expressly stated in employee training.

For any marketing campaigns, Sirius Telecom has a supervisory review process that, *inter alia*, ensures sales personnel obtain supervisory approval for any outbound marketing request for customer approval. The process is designed to ensure that the marketing is conducted in a manner compliant with the Commission's rules on CPNI including but not limited to the maintenance of compliance records for a minimum of one year.

Sirius Telecom only provides CPNI to inbound callers after customer authentication. Additionally, when on the phone with a non-authenticated customer, our employees only discuss call detail information to the extent that such information is provided by the customer.

For billing purposes, Sirius Telecom may use call detail information in its switch records when such records are generated by connectivity services. But the information in these records organized in a manner that would prevent Sirius Telecom from identifying individual consumers. Such information is only shared with properly authenticated customers and solely by sending such records to the authenticated customer's address of record. For online access to CPNI, Sirius Telecom first authenticates the customer without the use of readily available biographical information or account information and has a customer password creation and lost/forgotten password replacement process that is not prompted by Sirius

Telecom asking for readily available biographical information or account information. When an authentication method or address of record changes, Sirius Telecom notifies a customer through a voicemail, text message, and/or by mail to the address of record without revealing the changed information.

Sirius Telecom does not have retail stores and thus does not provide customers in-store access to CPNI.

Should a CPNI breach occur, Sirius Telecom will notify law enforcement, the USSS, FBI, and customers in accordance with 47 C.F.R. § 64.2011. It will maintain a record of such breaches for at least two years.

Should Sirius Telecom engage in marketing practices that trigger opt-out notice requirements, it will implement processes to ensure the FCC receives within five business days written notice of any instance where the opt-out mechanisms fail to function properly to a degree that customers' failure in their attempt to opt-out is more than a mere anomaly.